

ECF FILED ON December 14, 2012

Michael W. Chen, Esquire  
Nevada Bar No. 7307  
Charles L. Kennon, III, Esq.  
Nevada Bar No. 7772  
THE COOPER CASTLE LAW FIRM  
A Multi-Jurisdictional Law Firm  
5275 S. Durango Drive  
Las Vegas, NV 89113  
(702) 435-4175/(702) 259-6560 (facsimile)  
mrosales@ccfirm.com  
Loan No. 0202665907 / Our File No. 10-06-6997-  
Attorney for Secured Creditor SunTrust Mortgage Inc.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA

In re:

ROGER PIERRE BAYLOCQ

Debtor(s)

CHAPTER 11  
BANKRUPTCY NO.: 10-51372-GWZ  
DATE: Dec. 19, 2012  
TIME: 10:00 AM

**RESPONSE TO MOTION TO COMPEL PERFORMANCE UNDER  
CONFIRMED PLAN (SUNTRUST)**

SunTrust Mortgage Inc. is a Secured Creditor in the above-entitled bankruptcy proceeding and hereby submits the following Response to the Debtor's Motion to Compel Performance Under Confirmed Plan (SunTust), and states as follows:

1. SunTrust holds a security interest in the form of a first deed of trust on the property located at 2370 Del Monte Lane, Reno, NV 89511. It is working to accomplish the conveyance of the subject property back into the name of Debtor herein as set forth in the court order cited in Debtor's motion.

2. SunTrust has not engaged in willful disobedience or deliberate delay in implementing the orders of this court. It will comply with both the order of this court and the order confirming Debtor's Plan.

WHEREFORE, Secured Creditor prays as follows:

- 1
- 2 (1) Debtors' Motion to Compel Performance Under Confirmed Plan be denied;
- 3 (2) For any and all other relief that this Court deems appropriate.
- 4

5 Charles L. Kennon III  
6 Charles L. Kennon, III, Esq.  
7 Nevada Bar No. 7772  
8 Michael W. Chen, Esquire  
9 Nevada Bar No. 7307  
10 5275 S. Durango Drive  
11 Las Vegas, NV 89113  
12 Attorneys for Secured Creditor  
13 **SunTrust Mortgage Inc.**  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**CERTIFICATE OF SERVICE**

The undersigned hereby declares and certifies that on December 14, 2012, a copy of the Secured Creditors RESPONSE TO MOTION TO COMPEL PERFORMANCE UNDER CONFIRMED PLAN was served on the parties through the following means:

**Electronically mailed to:**

COUNSEL FOR DEBTOR(S)	TRUSTEE
JOHN WHITE, ESQ.	U.S. TRUSTEE-LV-11
bankruptcy@whitelawchartered.com	USTPRegion17.lv.ecf@usdoj.gov

**Depositing a copy in the United States Mail, postage prepaid and addressed to:**

Roger Pierre Baylocq	Roger Pierre Baylocq
1275 Stardust Street	2370 Del Monte Lane
Reno, NV 89503	Reno, NV 89511

I declare under penalty of perjury that the foregoing is true and correct.

  
An employee of THE COOPER CASTLE LAW FIRM